

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS

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IN RE:

CHAPTER 13

BK NO: 17-11368 MSH

Clay A. Moore

Gail A. Moore

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**MOTION TO CONVERT CASE FROM CHAPTER 7 TO CHAPTER 13**

Now come Clay A. Moore and Gail A. Moore (the “Debtors”), pursuant to 11 U.S.C. § 706, request that this Honorable Court enter an order converting this case under Chapter 7 to a case under Chapter 13 of the Bankruptcy Code. In support of said motion, the Debtors state the following:

1. The Debtors filed for relief pursuant to Chapter 7 of the Bankruptcy Code on April 17, 2017.
2. This case has not been previously converted under 11 U.S.C. § 1112, §1208, or §1307.

WHEREFORE, the Debtors respectfully requests that this Honorable Court enter an Order converting this case under Chapter 7 to a Chapter 13 of the Bankruptcy Code; and other further relief as this Honorable Court deems meet and just.

Respectfully Submitted

Clay A Moore and Gail A. Moore,  
Debtors

By and Through his Attorney

/s/ Felicia A. Manni-Paquette, Esq.

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Dated: May 29, 2017

**CERTIFICATE OF SERVICE**

I, Felicia A. Manni-Paquette, Esq., do hereby certify that on May 29, 2017, I electronically filed with the Clerk of the Bankruptcy Court the Debtor's Motion to Convert, and served same in the following manner upon the interested parties:

E-Mail Service: via the Court's CM/ECF system which sent notification of such filing to the following:

- Donald Lassman, Chapter 7 Trustee
- John Fitzgerald USTPRegion01.BO.ECF@USDOJ.GOV
- Alex F. Mattera, on behalf of Chapter 7 Trustee

By regular mail, postage prepaid on May 29, 2017, to all parties on the attached Exhibit "A".

/s/Felicia A. Manni-Paquette

Felicia A. Manni-Paquette

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